



BellSouth Telecommunications, Inc.

Legal Department
1600 Williams Street
Suite 5200
Columbia, SC 29201

patrick.turner@bellsouth.com

Patrick W. Turner
General Counsel-South Carolina

803 401 2900
Fax 803 254 1731

May 9, 2006

The Honorable Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Proceeding to Establish Guidelines for an Intrastate Universal Service Fund
Docket No. 97-239-C

Dear Mr. Terreni:

Enclosed for filing are the original and one copy of BellSouth Telecommunications, Inc.'s ("BellSouth's") Response to Petitions by ORS and SCCTA. This document is an exact duplicate of the e-filed copy submitted to the Commission in accordance with its electronic filing instructions.

By copy of this letter, I am serving all parties of record with a copy of this response as indicated on the attached Certificate of Service.

Sincerely,

 *permission JED*

Patrick W. Turner

PWT/nml

Enclosure

cc: All Parties of Record

PC Docs # 632853

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET NO. 97-239-C

IN RE:

Proceeding to Establish Guidelines for an)
Intrastate Universal Service Fund)
_____)

BELLSOUTH'S RESPONSE TO PETITIONS BY ORS AND SCCTA

BellSouth Telecommunications, Inc. respectfully submits this Response to the ORS's Petition for Order Clarifying USF Guidelines and Request for Expedited Relief, the SCCTA's Petition in Support of ORS's Petition and to Raise Additional Issues, and the ORS's Motion for Expedited Review.

I. BellSouth Supports the ORS's Petition and the ORS's Motion for Expedited Review.

BellSouth supports the ORS's position on each of the five issues discussed in its Petition. BellSouth also supports the ORS's request that the Commission review and rule on those five issues (which request clarification of existing guidelines) on an expedited basis, separate and apart from the issues raised in the SCCTA's Petition (which request changes to the existing guidelines and/or expansion of those guidelines to address issues that are not addressed today).

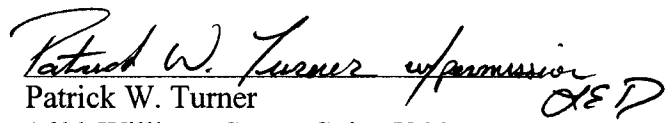
II. BellSouth Requests That the Commission Consider the SCCTA's Request to Address Additional Issues Separate and Apart from the ORS's Petition.

In its Petition, the SCCTA asks the Commission to: consider whether to assess wireless revenues for inclusion in the USF; revise its guidelines to require annual reviews

of costs and charges; and revise its guidelines to address whether access lines sold as part of a bundled offering should be eligible for support from the USF. At this time, BellSouth does not take a position on whether the Commission should address any or all of these issues or on how the Commission should decide any issue it may decide to address. BellSouth, however, agrees with the ORS that SCCTA's Petition "raises some highly controversial matters that would require a notice and hearing."

Additionally, BellSouth is withdrawing less than 20% of the total amount it is entitled to withdraw from the state USF. It is highly unlikely that the "cost and charges" data BellSouth submitted in this docket has changed by more than 80% or that more than 80% of the service BellSouth provides in South Carolina constitutes a bundled offering. Accordingly, it is highly unlikely that any decision the Commission might make on these issues would call into question BellSouth's right to continue receiving its current level of withdrawals from the State USF.

Respectfully submitted,


Patrick W. Turner
1600 Williams Street, Suite 5200
Columbia, South Carolina 29201
803-401-2900
patrick.turner@bellsouth.com

ATTORNEY FOR BELL SOUTH
TELECOMMUNICATIONS, INC.

632700

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth's Response to Petitions by ORS and SCCTA in Docket No. 97-239-C to be served upon the following this May 9, 2006:

Florence P. Belser
General Counsel
Post Office Box 11263
Columbia, South Carolina 29211
(Office of Regulatory Staff)
(U. S. Mail and Electronic Mail)

Frank Ellerbe, III, Esquire
Robinson, McFadden & Moore
Post Office Box 944
Columbia, South Carolina 29202
(SECCA)
(SCCTA)
(U.S. Mail and Electronic Mail)

F. David Butler, Esquire
Senior Counsel
South Carolina Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(U.S. Mail and Electronic Mail)

Jocelyn G. Boyd, Esquire
Staff Attorney
S. C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(U. S. Mail and Electronic Mail)

Joseph Melchers
Chief Counsel
S.C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(U.S. Mail and Electronic Mail)

Dulaney L. O’Roark III, Esquire
6 Concourse Parkway, Suite 600
Atlanta, GA 30328
(MCI, Inc.)
(U. S. Mail and Electronic Mail)

M. Zel Gilbert, Esquire
Director-External Affairs
Sprint
1122 Lady Street, Suite 1050
Columbia, South Carolina 29201
(U.S. Mail and Electronic Mail)

John F. Beach, Esquire
John J. Pringle, Jr., Esquire
Ellis Lawhorne & Sims, P.A.
Post Office Box 2285
Columbia, South Carolina 29202
(SCPCA)
(U.S. Mail and Electronic Mail)

Scott A. Elliott, Esquire
Elliott & Elliott, P.A.
721 Olive Street
Columbia, South Carolina 29205
(United Telephone & Sprint Communications)
(U.S. Mail and Electronic Mail)

William R. Atkinson
Sprint
3065 Cumberland Circle
Mailstop GAATLD0602
Atlanta, Georgia 30339
(U.S. Mail and Electronic Mail)

Faye A. Flowers, Esquire
Parker Poe Adams & Bernstein LLP
Post Office Box 1509
Columbia, South Carolina 29202-1509
(LCI International)
(U.S. Mail and Electronic Mail)

Robert E. Tyson, Jr., Esquire
Sowell Gray Stepp & Laffitte, LLC
1310 Gadsden Street
Columbia, South Carolina 35802
(ITC^DeltaCom Communications, Inc.)
(U.S. Mail and Electronic Mail)

Mary Conquest
ITC^DeltaCom/BTI
7037 Old Madison Pike
Suite 400
Huntsville, Alabama 35806
(U.S. Mail and Electronic Mail)

Darra W. Cothran, Esquire
Woodward, Cothran & Herndon
1200 Main Street, 6th Floor
Post Office Box 12399
Columbia, South Carolina 29211
(MCI)
(U.S. Mail and Electronic Mail)

M. John Bowen, Jr., Esquire
McNair Law Firm
Post Office Box 11390
Columbia, South Carolina 29211
(SCTA & SCTC)
(U.S. Mail and Electronic Mail)

Stan J. Bugner, State Director
Verizon Select Services, Inc.
1301 Gervais Street, Suite 825
Columbia, South Carolina 29201
(U.S. Mail and Electronic Mail)

Steven W. Hamm, Esquire
Richardson, Plowden, Carpenter & Robinson
Post Office Box 7788
Columbia, South Carolina 29202
(U.S. Mail and Electronic Mail)

Susan B. Berkowitz, Esquire
SC Appleseed Legal Justice Center
Post Office Box 7187
Columbia, South Carolina 29202
(U.S. Mail and Electronic Mail)

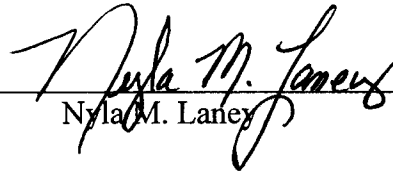
John M. S. Hoefer, Esquire
Willoughby & Hoefer, PA
Post Office Box 8416
Columbia, South Carolina 29202-8416
(Verizon)
(U.S. Mail and Electronic Mail)

Craig K. Davis, Esquire
1420 Hagood Drive
Columbia, South Carolina 29205
South Carolina Office of Info. Resources Budget & Control Board
(U.S. Mail and Electronic Mail)

Gene V. Coker, Esquire
1200 Peachtree Street, NE
Suite 8100
Atlanta, Georgia 30309
(AT&T)
(U.S. Mail and Electronic Mail)

John J. Pringle, Esquire
Ellis Lawhorne & Sims, P.A.
Post Office Box 2285
Columbia, South Carolina 29202
(AT&T)
(U. S. Mail and Electronic Mail)

Robert D. Coble, Esquire
Nexsen, Pruet, Adams, Kleemeier
1441 Main Street, Suite 1500
Columbia, South Carolina 29201
(Alltel South Carolina Incorporated)
(U.S. Mail and Electronic Mail)



Nyla M. Laney

483895